

EXHIBIT 2

Ubaldo, Antonia
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

L.C., a minor by and through her)
guardian ad litem Maria Cadena,)
individually and as)
successor-in-interest to Hector)
Puga; I.H., a minor by and through)
his guardian ad litem Jasmine) No. 5:22-cv-00949-KK-(SHKx)
Hernandez, individually and as)
successor-in-interest to Hector)
Puga; A.L., a minor by and through)
her guardian ad litem Lydia Lopez,)
individually and as)
successor-in-interest to Hector)
Puga; and ANTONIA SALAS UBALDO,)
individually,)
)
Plaintiffs,)
)
vs.)
)
STATE OF CALIFORNIA; COUNTY OF SAN)
BERNARDINO; S.S.C., a nominal)
defendant; ISAIAH KEE; MICHAEL)
BLACKWOOD; BERNARDO RUBALCAVA;)
ROBERT VACCARI; JAKE ADAMS; and)
DOES 6-10, inclusive,)
)
Defendants.)
_____)

REMOTE VIDEOTAPED DEPOSITION OF ANTONIA SALAS UBALDO

Bellflower, California

Tuesday, December 3, 2024

Volume I

Reported by:
JILL GLANTZ
CSR No. 11341
Job No. 131706

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L.C., a minor v. State of California**

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3 L.C., a minor by and through her)
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14 BLACKWOOD; BERNARDO RUBALCAVA;)
ROBERT VACCARI; JAKE ADAMS; and)
15 DOES 6-10, inclusive,)
16)
Defendants.)
17)

18 Remote videotaped deposition of ANTONIA SALAS
19 UBALDO, Volume I, taken on behalf of Defendants, in
20 Bellflower, California, beginning at 10:05 a.m. and
21 ending at 3:56 p.m. on Tuesday, December 3, 2024,
22 before JILL GLANTZ, Certified Shorthand Reporter
23 No. 11341.
24
25

**Ubaldo, Antonia
L.C., a minor v. State of California**

1 APPEARANCES:

2
3 For Plaintiffs L.C., I.H., A.L., and Antonia Salas

4 Ubaldo:

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13 For Defendant County of San Bernardino, Robert

14 Vaccari, and Jake Adams:

15 LYNBERG & WATKINS, A Professional Corporation

16 BY: SHANNON L. GUSTAFSON

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1 APPEARANCES (continued):

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3 For Defendants State of California by and through
4 California Highway Patrol and Michael Blackwood:

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7 Attorney at Law

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12
13 Videographer:

14 BLAKE JONES

15
16 Interpreter:

17 CARMEN STRICKLAND

**Ubaldo, Antonia
L.C., a minor v. State of California**

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**Ubaldo, Antonia
L.C., a minor v. State of California**

1 Bellflower, California, Tuesday, December 3, 2024

2 10:05 a.m.

3

4 THE VIDEOGRAPHER: Good morning. This is the

10:05:48

5 video deposition of Antonia Salas Ubaldo, taken

6 remotely on Tuesday, December 3rd, 2024, in the

7 matter of L.C., et al. versus State of California,

8 County of San Bernardino, Case Number

9 5:22-cv-00949-KK-(SHKx). This case is being heard

10:06:23

10 in the United States District Court, Central

11 District of California.

12 My name is Blake Jones, Legal Videographer

13 contracted through Dean Jones Legal Videos,

14 Incorporated of Los Angeles and Santa Ana,

10:06:32

15 California. Since we're not in person, the

16 videographer might have to interrupt the proceedings

17 if the deponent drifts out of frame or there is any

18 connectivity issues. This deposition is commencing

19 at 10:06 a.m.

10:06:44

20 Would all present please identify themselves,

21 beginning with the deponent.

22 THE WITNESS: Antonia Salas Ubaldo.

23 MS. GUSTAFSON: Shannon Gustafson for the San

24 Bernardino County Sheriff's Department Defendants.

10:07:08

25 MS. ESQUIVEL: Good morning. Diana Esquivel

1 on behalf of the State of California and Officers
2 Blackwood, Rubalcava and Kee, appearing from
3 Sacramento, California.

4 MS. LE: Good morning. Hang Le on behalf of
10:07:24 5 the Plaintiff Antonia Salas Ubaldo and the
6 Plaintiffs.

7 THE INTERPRETER: And good morning. This is
8 Carmen Strickland, a state certified court
9 interpreter. Certification Number is 301388.

10:07:35 10 THE VIDEOGRAPHER: Will the court reporter
11 please administer the oath.

12 THE REPORTER: Yes. Please, Ms. Ubaldo,
13 please raise your right hand so I can swear you in.

14 THE INTERPRETER: Do you want to swear in the
15 interpreter first?

16 THE REPORTER: I'm sorry. Yes.

17 CARMEN STRICKLAND,
18 was administered an oath to act as English/Spanish
19 interpreter.

20 ANTONIA SALAS UBALDO,
21 having been first administered an oath through the
22 interpreter, was examined and testified through the
23 interpreter as follows:

24 ///

25 ///

1 Hector got arrested even though he did not do
2 anything wrong? Is that what you're telling us?

3 A I'm going to tell you that I don't know how
4 the fight started. But I know how everything ended
12:43:23 5 up.

6 Q And so I'm going to ask you again. To your
7 knowledge, did Hector ever hit this girl?

8 A No.

9 Q And so do you believe that Hector got
12:43:49 10 arrested for domestic violence for no reason?

11 A They took him to the hospital because they
12 called the police because Hector was not feeling
13 well. But they were going to take her for lying.

14 Q So did Hector ever get arrested as a result
12:44:30 15 of this fight that you have been describing? "Yes,"
16 "no," or "I don't know"?

17 A No.

18 Q Has Hector ever been arrested for any type of
19 domestic violence?

12:44:55 20 A I don't remember if he was.

21 Q Are you aware that your son has been arrested
22 in the past?

23 A Yes.

24 Q To your knowledge, how many times has Hector
12:45:42 25 been arrested?

1 A I don't remember how many times.

2 Q Are you able to estimate how many times?

3 More than five? Less than five?

4 A I don't remember.

12:46:20 5 Q What is your understanding of the reasons
6 that Hector has been arrested?

7 A I don't remember. I don't know. I don't
8 remember why, but he was -- he had been arrested.

9 Q Can you tell me any of the reasons that
12:47:11 10 Hector has been arrested?

11 A I don't remember why he was arrested. I had
12 been in court for him, but I don't remember why.

13 Q Has Hector ever been to jail or prison?

14 A Yes.

12:48:11 15 Q How many times?

16 A About two or three times.

17 Q Do you know where he was in jail or prison?

18 A Here in Los Angeles. In Los Angeles and --
19 what's the name? I don't remember, but he was in
12:49:07 20 another one.

21 Q Do you remember the city that the other place
22 was located?

23 A It's a ranch. I don't remember what they
24 call it. I really don't remember.

12:49:42 25 Q Do you remember when he was in Los Angeles in

1 THE WITNESS: That's what I was thinking. It
2 was, like, one hour one way and one hour on the way
3 back.

4 BY MS. GUSTAFSON:

12:53:18 5 Q Do you recall how long he was in that
6 location?

7 A I don't remember if it was a year or less. I
8 don't remember very well.

9 Q Do you know how old he was when he was there?

12:53:47 10 A No, I don't remember.

11 Q Do you know why he was at this other jail
12 that you can't remember the name of?

13 A I don't know why.

14 Q Did you ever talk to Hector about the reasons
12:54:10 15 that he got arrested or went to jail?

16 A Well, I would call on the phone, and he would
17 ask me, "Mom, what are you doing?"

18 And I would tell him, "I'm cleaning the
19 house." And I would tell him, "And you are there
12:54:56 20 because you want to."

21 Q Did he ever tell you the reasons that he was
22 in jail?

23 A I don't remember.

24 Q Do you know how long Hector had been out of
12:55:46 25 jail at the time that he died?

1 A On weekends, they would -- we would clean the
2 walls. They all helped. One of them would vacuum,
3 clean. The other one would clean the kitchen. The
4 other one would mop. Everybody helped.

03:06:12

5 Q Is it fair to say that all of your kids,
6 including Hector, helped you clean the house?

7 A Of course, yes. And I would also have yard
8 sales, and they will help me get the things out and
9 sell things with me.

03:06:47

10 Q Was there anything that Hector would help you
11 with that your other kids did not?

12 A Well, everybody did different tasks, but they
13 all helped.

14 Q What types of things did you do with Hector
15 when he was alive?

03:07:24

16 A Well, he enjoyed being with me a lot, and we
17 would be in the truck playing the radio, and we
18 would take turns. He -- I wanted to listen in
19 Spanish. He would change it to English. He would
20 clean the truck. He was very close to me. He would
21 come to me to the store, to the park, always with
22 me.

03:08:26

23 Q I think that is all I have. I will turn the
24 floor over to Diana.

03:09:04

25 A That's fine.

1 A Yes.

2 Q Did you ever find out why he ended up going
3 to prison?

4 A Well, yes.

03:24:57 5 Q And why was that?

6 A He had a problem with the police when he
7 lived with Yobanna.

8 Q Before he was sent to prison, do you know if
9 he had a trial that resulted in him being found
03:25:30 10 guilty of some crime?

11 A No.

12 Q So is it fair to say that you never attended
13 any trial that Hector underwent after he was shot by
14 police in March of 2015?

03:26:28 15 A Are you asking if I went to court?

16 Q Yes. Have you ever went to observe Hector's
17 trial?

18 A Yes.

19 Q Did you learn during your observation of
03:26:52 20 Hector's trial that he was convicted of battering
21 his wife Yobanna?

22 A I didn't know well everything that had
23 happened, but there was a problem there.

24 Q Did you ever learn during that trial that he
03:27:50 25 beat her with a gun?

1 A No.

2 Q Did you ever talk to Yobanna after Hector was
3 convicted of what had transpired between them that
4 resulted in Hector's conviction?

03:28:29 5 A No.

6 Q Did you ever ask Hector about what had
7 transpired between him and his wife that resulted in
8 him being convicted and sent to prison?

9 A I didn't find out things like that.

03:29:11 10 Q My question was a little more specific. My
11 question -- well, let me back up. You were aware
12 that Hector was sentenced to seven years in prison
13 as a result of the incident between him and Yobanna.
14 Is that correct?

03:29:40 15 A No.

16 Q Did you ever find out how long he was
17 sentenced to prison for?

18 A How could I explain? No.

19 Q You remember earlier you were shown some
03:30:14 20 photographs, and one of those photographs, it was
21 Hector in prison uniform. Do you remember that
22 photograph?

23 A Yes.

24 Q So you went to visit him in prison; correct?

03:30:42 25 A Yes.

1 I, the undersigned, a Certified Shorthand
2 Reporter of the State of California, do hereby
3 certify:

4 That the foregoing proceedings were taken
5 before me at the time and place herein set forth;
6 that any witnesses in the foregoing proceedings,
7 prior to testifying, were administered an oath; that
8 a record of the proceedings was made by me using
9 machine shorthand which was thereafter transcribed
10 under my direction; that the foregoing transcript is
11 a true record of the testimony given.

12 Further, that if the foregoing pertains to
13 the original transcript of a deposition in a Federal Case,
14 before completion of the proceedings, review
15 of the transcript {X} was { } was not requested.

16 I further certify I am neither financially
17 interested in the action nor a relative or employee of any
18 attorney or party to this action.

19 IN WITNESS WHEREOF, I have this date subscribed my
20 name.

21
22 Dated: December 10, 2024



JILL GLANTZ
CSR No. 11341